

July 13, 2018

The Honorable Robert W. Lehrburger,
 United States District Court for the,
 Southern District of New York,
 500 Pearl Street,
 New York, New York 10007-1312.

Re: *Chen-Oster, et al. v. Goldman, Sachs & Co., et ano.*,
No. 10 Civ. 6950 (AT) (RWL)

Dear Judge Lehrburger:

On behalf of all parties, we write concerning the schedule adopted by the Court on January 30, 2018 for the completion of fact discovery, expert discovery, and reports and briefing of Plaintiffs' motion for class certification pursuant to Federal Rule of Civil Procedure 23(b)(2). (ECF No. 568.)

The parties have met the schedule to date. We write jointly to request an adjustment going forward, in light of the fact that medical complications experienced by both sides' experts have impeded the parties' ability to complete expert discovery in accordance with the current schedule. The proposed adjustment would allow for expert discovery once the experts are available, with submission of further expert reports and motion briefing under a schedule that is both consistent with the time sequence of the earlier order and that will likewise be complete before the end of the year.

In addition, the depositions of Plaintiffs De Luis and Gamba, which as described in the parties' May 23, 2018 Joint Progress Report (ECF No. 596) had been set for May 22 and 24, 2018, respectively, were adjourned by Goldman Sachs in light of the briefing due May 23. They have now been rescheduled and will be completed by mid-September.

With respect to the agreed-upon dates, we jointly propose the following schedule:

Event	January 30, 2018 Order	Parties' Joint Proposal
Data and Document Discovery		
Document and data production completed	March 30, 2018	Same
Fact discovery completed	March 30, 2018	Same
Expert Discovery		
Plaintiff new/revised reports	June 29, 2018	Same
Depositions of Plaintiffs' experts	July 17, 2018	August 14, 2018
Defendant new/revised reports	August 1, 2018	August 29, 2018
Depositions of Defendant experts	August 15, 2018	September 21, 2018
Plaintiff reply expert reports	August 29, 2018	October 4, 2018
Briefing Schedule		
Plaintiff brief in support of class cert.	September 17, 2018	October 18, 2018
Defendant brief in opposition	October 26, 2018	November 29, 2018
Plaintiff reply brief	November 16, 2018	December 20, 2018

The Honorable Robert W. Lehrburger

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We thank the Court for its consideration.

Respectfully,

/s/ Adam T. Klein

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